



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

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OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

June 18, 2009

Karl Dekome, Team Leader
Access Management EIS
3815 Schreiber Way
Coeur d' Alene, Idaho 83815

RE: U.S. Environmental Protection Agency (EPA) review and comments for the U.S. Forest Service's (USFS) Draft Supplemental Environmental Impact Statement (DSEIS) on Forest Plan Amendments for Motorized Access Management Within the Selkirk and Cabinet-Yaak Grizzly Bear Recovery Zones. **EPA Project Number: 01-035-AFS**

Dear Mr. Dekome:

This review was conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Under our policies and procedures, we evaluate the environmental impact of the proposed action and the adequacy of the impact statement. We have assigned a Lack of Objections (LO) rating to the DSEIS. A copy of the EPA rating system is enclosed.

We appreciate the close coordination between the USFS and U.S. Fish and Wildlife Service (USFWS) in the design of these Forest Plan Amendments and respect the challenge inherent in balancing grizzly bears' habitat needs with the social and economic well-being of the local communities. We do not object to the Forest Service's preferred alternative, Alternative E Updated.

In our enclosed comments we suggest a mitigation measure that could be accomplished with only minor changes to the proposal and recommend the addition of clarifying language. Our suggested mitigation measure is the addition of a Design Element for the installation of grizzly bear information signs at major access points in and around the recovery zones. Our recommendations for additional clarifying language and information relate to the importance of establishing hydrologic stability for roads that are closed to create core area, and the potential effects of climate change on grizzly bear recovery.

Thank you for this opportunity to comment and if you have any questions please contact Erik Peterson of my staff at (206) 553-6382.

Sincerely,

/s/

Christine B. Reichgott, Manager
Environmental Review and Sediment
Management Unit

Enclosures:
EPA Region 10 Detailed Comments
EPA Rating System for Draft EISs

**EPA REGION 10 DETAILED COMMENTS FOR THE USFS DSEIS ON FOREST PLAN
AMENDMENTS FOR MOTORIZED ACCESS MANAGEMENT WITHIN THE SELKIRK AND
CABINET-YAAK GRIZZLY BEAR RECOVERY ZONES**

Grizzly Bear Information Signs

According to Table 9 in the DSEIS ten grizzly bear mortalities within the Cabinet-Yaak and Selkirk Recovery Zones (CYRZ and SRZ) between 1982 and 2008 were caused by self defense and human error in identifying bear species and another eight mortalities resulted from unknown human causes. Taken together these human-caused mortalities represent 50% of the known mortalities over the 26 year time period.

We appreciate that both alternatives are rated “high” for “Level of mitigation for grizzly bear mortality risk” and believe that further conservation opportunities exist. One such opportunity - which is consistent with the conclusions detailed on pages 45-53 of the DSEIS (e.g., that an effective grizzly bear recovery program involves many elements) – is to combine grizzly bear information signs with project level access management actions.

Recommendation

We recommend that the Final SEIS consider the potential benefits of incorporating the following Conservation Recommendation from Appendix B of the Forest Service’s 2004 Record of Decision as a programmatic Design Element. The Service’s Conservation Recommendation reads as follows, “The Forests install grizzly bear information signs at major access points advising the public of grizzly bear presence, proper sanitation and food storage techniques, and providing information on distinguishing characteristics between grizzly bears and black bears.” Incorporating this recommendation into any final compliance strategy may help to reduce human caused bear mortalities in and around the recovery zones.

Water Quality and Hydrologic Stability

We believe additional information on how Design Element D would be implemented at the project level would clarify how road closures lead to long-term water quality benefits. Design Element D currently states, “Roads closed to create Core Area...: Will be put in a condition such that a need for motorized access for maintenance is not anticipated for at least 10 years. Until such closed roads are placed in the above described condition, they will not be considered as contributing to Core Area.” (DSEIS, p. 18). The DSEIS also states that, “...roads closed to create Core Area would have hydrologic function restored,” (p. 211). From these statements it appears that establishing hydrologic stability (e.g., removing culverts and reconstructing stream channels) is a goal of Design Element D.

Elsewhere in the DSEIS, however, Design Element D’s implication for the establishment of hydrologic stability is less clear. On page 210, stabilization treatments are a “potential” and on page 146 the DSEIS concludes that long-term water quality benefits would be realized “Provided that the treatments of barriered and gated roads are adequate...” These statements imply that establishing hydrologic stability is an optional part of meeting Design Element D.

EPA believes that (i) the establishment of hydrologic stability (at least the reduction of road-related mass wasting and erosion potential) is central to the effective implementation of Design Element D and (ii) the specific methods for protecting long-term water quality are best determined at the project level.

Recommendation

We recommend that clarifying language be added to Design Element D. This clarifying language should provide assurance that minimizing risks to water quality – through the establishment of hydrologic stability - is an essential element for the implementation of Design Element D.

Climate Change

Likely impacts from an increased number of warm days and changes in the amounts and seasonal distributions of rainfall and snowpack include: altered water quantity and quality (e.g. temperature); timing of flow; spatial and temporal shifts of vegetative communities and wildlife habitat; increased frequency and intensity of wildfires; increased potential for bark beetles and other insects; potential increases for invasive species resistance to mitigation measures¹; and increased opportunities for warm weather recreation.

Recommendation

EPA recommends that the FSEIS discuss the potential effects of climate change on grizzly bear recovery. We are particularly interested in potential effects from the increased bark beetle and wildfire risk associated with climate change.

Suggested Climate Change References

EPA understands that many questions surrounding climate change remain unanswered, including what effects climate change might have on grizzly bear recovery in the CYRZ, SRZ and Bears Outside Recovery Zones. We believe the following resources, and especially those from the USFS's Climate Change Resource Center, provide useful background for a climate change discussion.

- Botkin, D.B. et al., 2007. Forecasting the effects of global warming on biodiversity. *Bioscience* 57, 227–236
- Grace, J., Berninger, F., Nagy, L., 2002. Impacts of climate change on the tree line. *Annals of Botany* 90, 537–544
- Morin, X., Thuiller, W. 2009. Comparing niche- and process-based models to reduce prediction uncertainty in species range shifts under climate change. *Ecology*, 90(5), 1301-1313
- Opdam, P., Wascher, D., 2004. Climate change meets habitat fragmentation: linking landscapes and biogeographical scale levels in research and conservation. *Biological Conservation* 117, 285–297
- Peterson, David L., McKenzie, Don. 2008. Wildland Fire and Climate Change. (May 20, 2008). U.S. Department of Agriculture, Forest Service, Climate Change Resource Center. <http://www.fs.fed.us/ccrc/topics/wildland-fire.shtml>
- Ruggiero, Len; McKelvey, Kevin; Squires, John; Block, William. 2008. Wildlife and Climate Change. (May 20, 2008). U.S. Department of Agriculture, Forest Service, Climate Change Resource Center. <http://www.fs.fed.us/ccrc/topics/wildlife.shtml>
- SAP 4.4. Adaptation Options for Climate-Sensitive Ecosystems and Resources | National Forests. <http://www.climate-science.gov/Library/sap/sap4-4/final-report/sap4-4-final-report-Ch3-Forests.pdf>

¹ http://www.ars.usda.gov/research/publications/Publications.htm?seq_no_115=134271

**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987